

1 **RESNICK & LOUIS, P.C.**
2 SUE TRAZIG CAVACO, ESQ.
Nevada Bar No. 6150
3 scavaco@rlattorneys.com
8925 West Russel Rd., Suite 220
4 Las Vegas, NV 89148
Telephone: (702) 997-3800
Facsimile: (702) 997-3800
Attorneys for Defendant,
5 *Westcor Land Title Insurance Company*

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 THE BANK OF NEW YORK MELLON,
F/K/A THE BANK OF NEW YORK, AS
9 TRUSTEE ON BEHALF OF THE
ALTERNATIVE LOAN TRUST 2005-62,
10 MORTGAGE PASS-THROUGH
CERTIFICATES

11 _____
Plaintiff,

12 v.

13 WESTCOR LAND TITLE INSURANCE
14 COMPANY,
15 _____

16 *Defendant,*

Civil Action No.
2:19-cv-00517-RFB-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT WESTCOR LAND TITLE
INSURANCE COMPANY
TO RESPOND TO PLAINTIFF'S
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS**

(First Request)

17 IT IS HEREBY STIPULATED by and between Plaintiff THE BANK OF NEW YORK
18 MELLON, F/K/A THE BANK OF NEW YORK, AS TRUSTEE ON BEHALF OF THE
19 ALTERNATIVE LOAN TRUST 2005-62, MORTGAGE PASS-THROUGH CERTIFICATES
20 ("Plaintiff") and Defendant WESTCOR LAND TITLE INSURANCE COMPANY ("Westcor"),
21 by and through their respective attorneys of record stipulate as follows:

- 22 1. Westcor filed a Motion to Dismiss Plaintiff's Complaint Pursuant to FRCP 12(b)(6)
23 ("MTD") on June 4, 2019. [EFC No. 8].
- 24 2. Per stipulation and order, Plaintiff's response was due on or by July 2, 2019.
- 25 3. Plaintiff did indeed file its Opposition to the MTD on July 2, 2019. [Doc. 13].
- 26 4. Westcor's reply brief is currently due on or by July 9, 2019.
- 27 5. Westcor's counsel requests additional time to file its reply brief, specifically until
28 July 22, 2019.
6. This extension is requested so as to afford Westcor's counsel enough time to review
and respond to the Opposition [Doc. 13] based upon counsel's current caseload and
schedule.

1 7. Plaintiff's counsel does not oppose this continuance.

2 8. This is the first such request for an extension and is made in good faith.

3 **IT IS SO STIUPULATED.**

4 DATED this 9th day of July, 2019.

5 WRIGHT, FINLAY & ZAK, LLP

6 /s/ Lindsay D. Robbins, Esq.

7 LINDSAY D. ROBBINS, ESQ.

8 Nevada Bar No. 13474

9 7785 W. Sahara Ave., Suite 200

10 Las Vegas, NV 89117

11 Attorneys for Plaintiff,

12 *The Bank Of New York Mellon, F/K/A The*

13 *Bank Of New York, As Trustee On Behalf Of*

14 *The Alternative Loan Trust 2005-62, Mortgage*

15 *Pass-Through Certificates*

DATED this 9th day of July, 2019.

RESNICK & LOUIS, P.C.

/s/ Sue Trazig Cavaco, Esq.

SUE TRAZIG CAVACO, ESQ.

Nevada Bar No. 6150

8925 West Russell Rd., Suite 220

Las Vegas, NV 89148

Attorneys for Defendant,

Westcor Land Title Insurance Company

16 **ORDER**

17 IT IS HEREBY ORDERED that Defendant, WESTCOR LAND TITLE INSURANCE
18 COMPANY, is granted an extension, up to and including July 22, 2019 to respond to Plaintiff's
19 Opposition to Defendant's Motion to Dismiss [ECF No. 13].

20 DATED: this 10th day of July, 2019.

21 

22 RICHARD F. BOULWARE, II

23 UNITED STATES DISTRICT JUDGE

24 **Respectfully Submitted By:**

25 **RESNICK & LOUIS, P.C.**

26 /s/ Sue Trazig Cavaco, Esq.

27 SUE TRAZIG CAVACO, ESQ.

28 Nevada Bar No. 6150

8925 West Russell Rd., Suite 220

Las Vegas, NV 89148

Attorneys for Defendant,

Westcor Land Title Insurance Company